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ATTORNEYS AND COUNSELORS AT LAW

ROBINSON, MCFADDEN & MOORE, P.C.

COLUMBIA | GREENVILLE

December 2, 2004

HAND DELIVERED

Mr. George N. Dorn, Jr.
Executive Director
Public Service Commission of South Carolina
Synergy Business Park, Saluda Building
101 Executive Center Drive
Columbia, SC 29210

Bonnie D. Shealy
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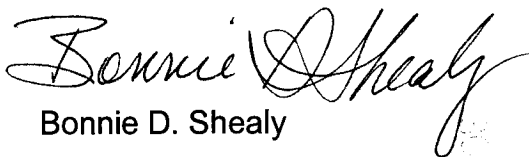
Re: Generic Docket – Amendments to Interconnection Agreements
Docket No. 2004-316-C
Our File No. 19336-0013

Dear Mr. Dorn:

Enclosed for filing please find the petition to intervene of the South Carolina Cable Television Association in the above referenced docket. By copy of this letter we are serving the same on all counsel of record. Please stamp the extra copies provided as proof of filing and return them with our courier. Should you need any additional information, please contact me.

Very truly yours,

ROBINSON, MCFADDEN & MOORE, P.C.


Bonnie D. Shealy

bds
Enclosure

cc/enc: Patrick W. Turner, BellSouth General Counsel
John J. Pringle, Jr., Esquire
Ms. Nancy Horne
Ms. Daphne Werts (via email)

172166
INTERVENOR
#2 1/24/05 10:30am
STATE OF SOUTH CAROLINA

ACCEPTED
2005-12-2-04
2004 DEC -2 PM 1:21
SOUTH CAROLINA
COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2004-316-C

IN RE:

PETITION TO ESTABLISH GENERIC
DOCKET TO CONSIDER AMENDMENTS
TO INTERCONNECTION AGREEMENTS
RESULTING FROM CHANGES OF LAW

PETITION TO INTERVENE

The South Carolina Cable Television Association ("SCCTA") hereby petitions the Public Service Commission of South Carolina ("Commission"), pursuant to 26 S.C. Regs. 103-836 and other applicable rules and regulations of the Commission for permission to intervene in the above-captioned proceeding. In support of this Petition, SCCTA would show the following:

1. SCCTA is a nonprofit corporation, organized and existing pursuant to the laws of the State of South Carolina, representing over one hundred franchised cable television systems operating within South Carolina.

2. SCCTA's authorized representatives in this proceeding are as follows:

SCCTA OFFICIAL

Ms. Nancy Horne
South Carolina Cable Television Association
6175 Barfield Road, Suite 200
Atlanta, Georgia 30328

and

RETURN DATE: OK
SERVICE: D. Werts

LEGAL REPRESENTATIVES

Frank R. Ellerbe, III, Esquire
Bonnie D. Shealy, Esquire
Robinson, McFadden & Moore, P.C.
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3. BellSouth Telecommunications, Inc. ("BellSouth") requested that the Commission establish a generic proceeding and hold an evidentiary hearing to determine what changes recent decisions from the Federal Communications Commission ("FCC") and the United States Court of Appeals for the District of Columbia Circuit ("DC Circuit") require in existing approved interconnection agreements between BellSouth and competitive local exchange carriers ("CLECs") in South Carolina.

4. SCCTA has an interest in the above-captioned proceeding inasmuch as SCCTA's members are potential providers and providers of competitive local exchange services in South Carolina. SCCTA hereby requests permission to intervene in the above-captioned proceeding as a formal party of record.

5. SCCTA's intervention will aid the Commission by assisting in the development of a full and fair record to address the issues raised in this proceeding. SCCTA's position in this docket is that the Commission should adopt reasonable and non-discriminatory policies for interconnection, unbundled network elements, and related services which are structured to allow CLECs to compete effectively in the market for local services.

6. SCCTA is informed and believes that granting its request to be made a party of record in the above-captioned proceeding is in the public interest, is consistent

with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing the views and concerns of SCCTA can be developed.

WHEREFORE, SCCTA prays for the following relief:

A. That this Petition to Intervene be granted by the Commission and that SCCTA be made a formal party of record to the proceeding.

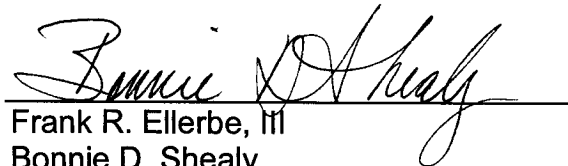
B. That SCCTA be allowed to participate fully in this proceeding and to take such positions as it deems advisable.

C. That such other and further relief be granted as is just and proper.

Dated this 2ND day of December, 2004.

ROBINSON, McFADDEN & MOORE, P.C.

By



Frank R. Ellerbe, III
Bonnie D. Shealy
Post Office Box 944
Columbia, SC 29202
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Attorneys for South Carolina Cable Television
Association

DOCKET NO. 2004-316-C

PETITION TO ESTABLISH
GENERIC DOCKET TO CONSIDER
AMENDMENTS TO
INTERCONNECTION
AGREEMENTS RESULTING FROM
CHANGES OF LAW

CERTIFICATE OF SERVICE

Mary F. Cutler